

*Via Electronic ECFS Filing*

March 2, 2009

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W, Suite TW-A325  
Washington, DC 20554

RE: CPNI Certification, EB-06-36

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules<sup>1</sup> and the Commission's *Public Notice*, DA 08-171, dated January 29, 2009 in the above-captioned matter, Bharti Airtel (USA) Limited, hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that Bharti Airtel (USA) Limited has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

Bharti Airtel (USA) Limited has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees that may have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. Bharti Airtel (USA) Limited's parent corporation follows this same procedure. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval, as the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

Bharti Airtel (USA) Limited



Giselle Cabrera  
Country General Manager  
Attachment

<sup>1</sup> 47 C.F.R. §64.2009(e).

**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date filed: March 2, 2009

Name of company covered by this certification: Bharti Airtel (USA) Limited

Form 499 Filer ID: 826875

Name of signatory: Giselle Cabrera

Title of signatory: Country General Manager

I, Giselle Cabrera, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. S: 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken, nor been compelled to take, any actions<sup>2</sup> against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Bharti Airtel (USA) Limited



Signed

Giselle Cabrera  
Country General Manager  
c/o 335 Madison Avenue, 12<sup>th</sup> Floor  
New York, NY 10017

<sup>2</sup> Proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers.

Via Electronic ECFS Filing

March 1, 2009

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W, Suite TW-A325  
Washington, DC 20554

RE: CPNI Certification, EB-06-36

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules<sup>3</sup> and the Commission's *Public Notice*, DA 08-171, dated January 29, 2009 in the above-captioned matter, Bharti Airtel Limited, hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that Bharti Airtel Limited has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

Bharti Airtel Limited has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees that may have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. Bharti Airtel Limited's subsidiary corporation follows this same procedure. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval, as the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,  
Bharti Airtel Limited

Rajan Swaroop  
Executive Director

Attachment

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<sup>3</sup> 47 C.F.R. §64.2009(e).

**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009.

Date filed: March 2, 2009

Name of company covered by this certification: Bharti Airtel Limited

Form 499 Filer ID: 826876

Name of signatory: Rajan Swaroop

Title of signatory: Executive Director

I, Rajan Swaroop certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. S: 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken, nor been compelled to take, any actions<sup>4</sup> against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Bharti Airtel Limited

Signed \_\_\_\_\_

Rajan Swaroop  
Executive Director  
c/o 335 Madison Avenue, 12<sup>th</sup> Floor  
New York, NY 10017

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<sup>4</sup> Proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers.